

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

LAURA BROWN,

Plaintiff.

vs.

Case No. 2:05CV70988
Hon. Patrick Duggan

AMERICAN AXLE & MANUFACTURING, INC.,
a foreign corporation,

Defendant.

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PROTECTIVE ORDER

At a session of said Court, held in the United States
District Court for the Eastern District of Michigan,
Southern Division on October 7, 2005.

Present: HON. PATRICK J. DUGGAN
United States District Court Judge

The Plaintiff having requested the production of certain documents from Defendant in Plaintiff's First Set of Interrogatories Dated August 19, 2005 and Plaintiff's First Request for Production of Documents Dated August 19, 2005 to Defendant, including documents which are considered and/or identified as being confidential and/or personal and the Court being fully advised in the premises;

IT IS HEREBY ORDERED that:

1. Documents produced pursuant to Defendant's Answers to Plaintiff's First Set of Interrogatories Dated August 19, 2005 and Plaintiff's First Request for Production of Documents Dated August 19, 2005 shall be kept in the custody and care of Plaintiff's counsel of record in this action and shall be disclosed and used only for the purposes of the conduct of this case and for no other purpose. All such information and documents and/or copies of the documents shall be disclosed by Plaintiff's counsel only to employees of Plaintiff's counsel, experts retained by the Plaintiff's counsel, the Court and/or mediation, case evaluation or arbitration panels and/or persons who have been identified as potential witnesses in this case, and said disclosure is to be made only to the extent essential to the preparation of this case and for no other purpose and provided that Plaintiff's counsel shall provide all such individuals with a copy of this Protective Order and all such individuals agree to be bound by the terms of this Protective Order.

2. Plaintiff's counsel shall maintain a list of all individuals who have had access to any of the materials to this Protective Order.

3. Individuals who, pursuant to paragraph 1. above and by virtue of their participation in the conduct of this case, have knowledge of information and/or documents produced pursuant to this Protective Order shall use such information and/or documents for the purpose of the conduct of this case and for no other purpose. Such individuals shall not disclose information obtained pursuant to these requests and documents and/or copies of the documents themselves, to any person or persons not directly involved in the conduct of this case.

4. All documents produced subject to this Stipulated Order and all copies thereof shall be returned to the producing counsel, after a final resolution of this case, including any appeals.

IT IS SO ORDERED.

s/PATRICK J. DUGGAN
United States District Judge

Approved as to form and substance:

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